

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS
ANTITRUST LITIGATION

Master File No. 12-md-02311
Honorable Marianne O. Battani

In Re: ALL AUTO PARTS CASES

THIS RELATES TO:
All Auto Dealer Actions
All End-Payor Actions

**STIPULATION AND ORDER REGARDING
BRIEFING SCHEDULE FOR OBJECTIONS TO
THE SPECIAL MASTER'S DECEMBER 29 ORDER GRANTING IN PART
AND DENYING IN PART PLAINTIFFS' MOTION FOR PROTECTIVE ORDER**

WHEREAS, on November 24, 2015, Auto Dealers filed Dealership Plaintiffs' Motion For Protective Order (12-md-2311, ECF No. 1144) regarding the 30(b)(6) notices served by Defendants on Auto Dealers; and

WHEREAS, on December 29, 2015, the Special Master entered the Special Master's Order Granting in Part and Denying in Part Plaintiffs' Motion For Protective Order (12-md-2311, ECF No. 1169); and

WHEREAS, pursuant to paragraph II(B) of the Order Appointing a Master (12-md-2311, ECF No. 792) the Special Master has the power to shorten the time for filing Objections to Orders of the Special Master.

IT IS THEREFORE STIPULATED AND AGREED by counsel for Auto Dealers and counsel for Defendants that:

1. Any Objections to the Special Master's December 29 Order will be filed by Tuesday, January 12, 2015;
2. Responses to these Objections will be filed by Monday, January 25, 2015; and
3. Replies, if any, in support of these Objections will be filed by Friday, January 29, 2015.

IT IS SO ORDERED.

Dated: January 8, 2016

/s/ Gene J. Esshaki

Special Master Gene J. Esshaki

STIPULATED AND AGREED.

MANTESE HONIGMAN ROSSMAN AND
WILLIAMSON, P.C.

/s/ Gerard V. Mantese
Gerard V. Mantese (P34424) MANTESE
HONIGMAN ROSSMAN AND
WILLIAMSON, P.C.
1361 E. Big Beaver Rd. Troy,
Michigan 48083
Telephone: (248) 457-9200
gmantese@manteselaw.com

*Dealership Plaintiffs' Interim Liaison
Counsel*

LARSON KING, LLP

/s/ Shawn M. Ratier
Shawn M. Raiter
LARSON KING, LLP
2800 Wells Fargo Place
30 East Seventh Street
St. Paul, MN 55101
Telephone: (651) 312-6500
sraiter@larsonking.com

CUNEO GILBERT &
LADUCA, LLP

/s/ Jonathan W. Cuneo
Jonathan W. Cuneo
Joel Davidow
Daniel Cohen
Victoria Romanenko
CUNEO GILBERT & LADUCA, LLP
507 C Street, N.E.
Washington, DC 20002
Telephone: (202) 789-3960
jonc@cuneolaw.com
joel@cuneolaw.com
danielc@cuneolaw.com
vicky@cuneolaw.com
BARRETT LAW GROUP, P.A.

WILMER CUTLER PICKERING HALE AND
DORR LLP

/s/ Steven F. Cherry
Steven F. Cherry
Patrick J. Carome
David P. Donovan
Dyanne M. Griffith
WILMER CUTLER PICKERING HALE AND
DORR LLP
1875 Pennsylvania Avenue, NW
Washington, D.C. 20006
Tel.: (202) 663-6000
Fax: (202) 663-6363
steven.cherry@wilmerhale.com
patrick.carome@wilmerhale.com
david.donovan@wilmerhale.com
dyanne.griffith@wilmerhale.com

*Attorneys for Defendants DENSO Corporation
and DENSO International America, Inc.*

Steven M. Zarowny (P33362)
General Counsel
DENSO International America, Inc.
24777 Denso Drive
Southfield, MI 48033
Tel.: (248) 372-8252
Fax: (248) 213-2551
steve_zarowny@denso-diam.com

*Attorney for Defendant DENSO International
America, Inc.*

WARNER NORCROSS & JUDD LLP

/s/ William R. Jansen (w/consent)
Michael G. Brady (P57331)
Michael G. Brady (P57331)
Amanda M. Fielder (P70180)
WARNER NORCROSS & JUDD LLP
2000 Town Center, Suite 2700
Southfield, MI 48075-1318
Phone: 248-748-5000
wjansen@wnj.com
mbrady@wnj.com
afielder@wnj.com

Michael Martinez

/s/ Don Barrett

Don Barrett
David McMullan
Brian Herrington
BARRETT LAW GROUP, P.A.
P.O. Box 927
404 Court Square
Lexington, MS 39095
Telephone: (662) 834-2488
dbarrett@barrettlawgroup.com
bherrington@barrettlawgroup.com
dmcmullan@barrettlawgroup.com

*Dealership Plaintiffs' Interim
Co-Lead Counsel*

Steven Kowal
Lauren Norris
Lauren Salins
K&L Gates LLP
70 W. Madison St., Suite 3100
Chicago, IL 60602
Phone: 312-827-8116
michael.martinez@klgates.com
steven.kowal@klgates.com
lauren.norris@klgates.com
lauren.salins@klgates.com

*Counsel for Chiyoda Manufacturing
Corporation and Chiyoda USA Corporation*

LANE POWELL PC

/s/ Larry S. Gangnes (w/consent)

Larry S. Gangnes
LANE POWELL PC
1420 Fifth Ave., Suite 4200
P.O. Box 91302
Seattle, WA 98111-9402
Tel.: (206) 223-7000
Fax: (206) 223-7107
gangnesl@lanepowell.com

Craig D. Bachman
Kenneth R. Davis II
Darin M. Sands
Masayuki Yamaguchi
Peter D. Hawkes
LANE POWELL PC
MODA Tower
601 SW Second Ave., Suite 2100
Portland, OR 97204-3158
Tel.: (503) 778-2100
Fax: (503) 778-2200
bachmanc@lanepowell.com
davisk@lanepowell.com
sandsd@lanepowell.com
yamaguchim@lanepowell.com
hawkesp@lanepowell.com

Richard D. Bisio (P30246)
Ronald S. Nixon (P57117)
KEMP KLEIN LAW FIRM
201 W. Big Beaver, Suite 600
Troy, MI 48084
Tel.: (248) 528-1111

Fax: (248) 528-5129
richard.bisio@kkue.com
ron.nixon@kkue.com

*Attorney for Defendant Furukawa Electric Co.,
Ltd. and American Furukawa, Inc.*

PORTER WRIGHT MORRIS & ARTHUR
LLP

/s/ Donald M. Barnes (w/consent)

Donald M. Barnes
Molly S. Crabtree
Jay L. Levine
Christopher C. Yook
PORTER WRIGHT MORRIS & ARTHUR
LLP
1900 K Street, NW, Ste. 1110
Washington, DC 20006
Tel.: (206) 778-3054
Fax: (206) 778-3063
dbarnes@porterwright.com
mcrabtree@porterwright.com
jlevine@porterwright.com
cyook@porterwright.com

*Attorney for Defendant G.S. Electech, Inc.,
G.S.W. Manufacturing, Inc., and G.S. Wiring
Systems, Inc.*

JENNER & BLOCK LLP

/s/ Terrance J. Truax (w/consent)

Terrence J. Truax
Charles B. Sklarsky
Michael T. Brody
Gabriel A. Fuentes
Dainel T. Fenske
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, IL 60654-3456
ttruaz@jenner.com
mbrody@jenner.com
gfuentes@jenner.com
dfenske@jenner.com

Gary K. August
Jamie J. Janisch
ZAUSMER, AUGUST & CALDWELL, P.C.

31700 Middlebelt Road, Suite 150
Farmington Hills, MI 48334-2374
gaugust@zacfirm.com
jjanisch@zacfirm.com

Counsel for Defendants Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc., and Mitsubishi Electric Automotive America, Inc.

BUTZEL LONG

/s/ Sheldon H. Klein (w/consent)

Sheldon H. Klein (P41062)
David F. DuMouchel (P25658)
BUTZEL LONG
150 West Jefferson, Suite 100
Detroit, MI 48226
Tel.: (313) 225-7000
Fax: (313) 225-7080
sklein@butzel.com
dumouchd@butzel.com

W. Todd Miller
BAKER & MILLER PLLC
2401 Pennsylvania Ave., NW, Suite 300
Washington, DC 20037
Tel.: (202) 663-7820
Fax: (202) 663-7849
TMiller@bakerandmiller.com

Attorneys for Defendants TRAM, Inc., and Tokai Rika Co., Ltd.